

CHRISTOPHER FROST (SBN 200336)

chris@wgfcounsel.com

ASHLEY MORRIS (SBN 225455)

ashley@wgfcounsel.com

JOHN MAATTA (SBN 83683)

john@wgfcounsel.com

WEINBERG GONSER FROST, LLP

10866 Wilshire Blvd., PH 1650

Los Angeles, California 90024

Telephone: (424) 407-4119

Facsimile: (424) 238-3060

Attorneys for Defendants,
Synta Technology Corp. of Taiwan; Suzhou
Synta Optical Technology Co.; Nantong
Schmidt Opt-Electrical Technology Co. Ltd.;
Synta Canada International Enterprises Ltd.;
Pacific Telescope Corp.; Olivon Manufacturing
Co. Ltd.; SW Technology Corp.; Celestron
Acquisition, LLC; Olivon USA LLC; David
Shen; Joseph Lupica; and David Anderson

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

IN RE: TELESCOPE ANTITRUST
LITIGATION

Case No. 5:20-cv-03639-EJD

Case No. 5:20-cv-03642-EJD

This document relates to

The Hon. Edward J. Davila

SPECTRUM SCIENTIFICS LLC, RADIO
CITY, INC., and those similarly situated,

**DEFENDANTS' FURTHER SUBMISSION
PURSUANT TO COURT'S ORDER
[Dkt. 332 and 400]**

Plaintiff,

vs.

CELESTRON ACQUISITION, LLC, SYNTA
CANADA INT'L ENTERPRISES LTD.,
SKYWATCHER USA, SKY-WATCHER
CANADA, SW TECHNOLOGY CORP.,
OLIVON MANUFACTURING CO. LTD.,
OLIVON USA, LLC, COREY LEE, SYLVIA
SHEN, JEAN SHEN, JOSEPH LUPICA,
DAVE ANDERSON, LAURENCE HUEN,
and DOES 1-50,

Defendants.

Pursuant to the Court's April 25, 2023 Order (Dkt. Nos. 332 and 400), the Plaintiffs selected 37 "representative" document entries for *in camera* submission in connection with Plaintiffs' March 1, 2023 Motion to Compel (Dkt. No. 305). Defendants hereby provide notice that the 37 representative documents at issue in the March 1, 2023 Motion to Compel are being submitted to the Court for *in camera* review on April 28, 2023.

Defendants further advise the Court that of the 37 representative documents submitted for *in camera* review, 31 of them are part of the "clawback documents" that are at issue in Defendants' Motion to Compel further Discovery Responses. (Case No. 20-3642, Dkt. No. 359). Those 31 documents that are at issue in Defendants' Motion to Compel are listed below, and are also identified accordingly on the hard copy documents submitted for *in camera* review:

Amended Clawback Log No. 2

Entry No. 3 - (control #36594200)
Entry No. 29 - (control #36381967)

Amended Clawback Log No. 3

Entry No. 4 - (control #36331068)
Entry No. 14 - (control #36337068)
Entry No. 19 - (control #36360159)
Entry No. 22 - (control #36366243)
Entry No. 25 - (control #36369635)
Entry No. 28 - (control #36374166)
Entry No. 38 - (control #36380259)
Entry No. 47 - (control #36394250)
Entry No. 48 - (control #36395475)
Entry No. 49 - (control #36395500)
Entry No. 55 - (control #36410458)
Entry No. 58 - (control #36413235)
Entry No. 60 - (control #36423026)
Entry No. 61 - (control # 36424160)
Entry No. 71 - (control# 36437405)
Entry No. 72 - (control#36442697)
Entry No. 77 - (control#36453296)
Entry No. 80 - (control#36465162)
Entry No. 83 - (control# 36469960)
Entry No. 84 - (control#36469993)
Entry No. 86 - (control#36479068)
Entry No. 95 - (control#36488804)
Entry No. 96 - (control#3648819)
Entry No. 109 - (control#36795359)
Entry No. 110 - (control#36795910)
Entry No. 111 - (control#36795913)

1 Entry No. 112 - (control#36796082)
2 Entry No. 122 - (control#36831388)
3 Entry No. 127 - (control#36929363)

4 DATED: April 28, 2023

WEINBERG GONSER FROST LLP

5 By:



6 CHRISTOPHER FROST
7 JOSHUA STAMBAUGH
8 ASHLEY MORRIS

9 Attorney for Defendants, Synta Technology Corp.
10 of Taiwan; Suzhou Synta Optical Technology Co.;
11 Nantong Schmidt Opt-Electrical Technology Co.
12 Ltd.; Synta Canada International Enterprises Ltd.;
13 Pacific Telescope Corp.; Olivon Manufacturing
14 Co. Ltd.; SW Technology Corp.; Celestron
15 Acquisition, LLC; Olivon USA LLC; David Shen;
16 Joseph Lupica; and David Anderson